

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

v.

**TANNER S. ADAM, JONATHAN L.
ADAM, TRITEN FINANCIAL GROUP,
LLC, and GCZ GLOBAL LLC,**

Defendants, and

**AVA A. ADAM, GARRETT L.W. ADAM,
ROBERT S. ADAM, CARRIE L. ADAM,
EMILIO F. HINOJOSA, AND VIRGINIA
I. HINOJOSA,**

Relief Defendants.

**Civil Action File No.
1:24-cv-03774-MHC**

PLAINTIFF’S MOTION FOR REMEDIES AND DEFAULT JUDGMENT

Plaintiff Securities and Exchange Commission (the “Commission”) respectfully submits this Motion for Remedies against Defendants Tanner S. Adam, Jonathan L. Adam, Triten Financial Group, LLC (“Triten”), and GCZ Global LLC (“GCZ”) (collectively “Defendants”) and for Default Judgment against Relief Defendants Ava A. Adam, Garrett L.W. Adam, Robert S. Adam,

Carrie L. Adam, Emilio F. Hinojosa, and Virginia L. Hinojosa (collectively “Relief Defendants”). On August 26, 2024, the Defendants consented, without admitting or denying the allegations of the complaint, to the entry of permanent injunctions prohibiting them from future violations of Section 17(a) of the Securities Act of 1933 (“Securities Act”) and Section 10(b) of the Securities Exchange Act of 1934 (“Exchange Act”) and Rule 10b-5 thereunder. The judgment entering the bifurcated settlements provided that the Defendants agreed to pay disgorgement, prejudgment interest, and civil penalties in amounts to be determined by the Court upon motion by the Commission and that for purposes of that motion, Defendants are precluded from contesting the allegations of the complaint.

On April 17, 2025, the Commission filed an amended complaint naming Ava Adam, Garrett Adam, Robert Adam, Carrie Adam, Emilio Hinojosa, and Virginia Hinojosa as relief defendants, seeking disgorgement and prejudgment interest from them. None of the Relief Defendants responded to the amended complaint. On September 29, 2025, the Clerk entered defaults against the Relief Defendants. This matter is now ripe for a determination of the appropriate remedies to be imposed against the Defendants and Relief Defendants.

The Commission has filed a memorandum of law, the September 30, 2025 Declaration of Krysta M. Cannon and the September 30, 2025 Declaration of Kristin W. Murnahan, both of which are filed concurrently herewith in support of

this motion. As set forth more fully in the Commission's memorandum of law, the Commission respectfully requests that its Motion be granted and that the Court issue a final judgment against Defendants that: (a) incorporates the previously entered injunctions; (b) finds Defendants jointly and severally liable for total disgorgement of \$30,512,775, plus prejudgment interest thereon of \$6,221,302, for a total of \$36,734,077; (c) and imposes a civil penalty of \$3,000,000 each against Tanner Adam and Jonathan Adam.

Because Defendants transferred a portion of the \$30 million they misappropriated to the Relief Defendants, the Commission requests that the final judgment set disgorgement against the Relief Defendants as follows:

<u>Relief Defendant</u>	<u>Disgorgement</u>	<u>Prejudgment Interest</u>	<u>Joint & Several Liability</u>
Ava Adam	\$931,000	\$64,202	w/Defendants
Garrett Adam	\$657,254	\$64,277	w/Defendants
Robert and Carrie Adam	\$515,782	\$39,280	w/each other and Defendants
Emilio and Virginia Hinojosa	\$379,695	\$34,345	w/each other and Defendants

Included in the disgorgement amounts set forth above are investor funds that were used to purchase properties titled in each relief defendant's name. To ensure that the Commission can collect the disgorgement and prejudgment interest ordered against Defendants and the Relief Defendants, the Commission requests that the Court order the following parties to relinquish all rights, interest and title in the following real properties:

1. Ava and Jonathan Adam to relinquish the property located at 518 Bryan Street, Angleton, Texas 77515;
2. Garrett Adam to relinquish the property located at 9 Greystone Court, Angleton, Texas 77515;
3. Robert and Carrie Adam to relinquish the property located at 719 S. Walker Street, Angleton, Texas 77515; and
4. Emilio and Virginia Hinojosa to relinquish the property at 715 S. Walker Street, Angleton, Texas 77515.

Finally, to avoid double-counting, the Commission requests that the Court offset any amounts collected from the Relief Defendants from the disgorgement and prejudgment interest obligation of Defendants.

The Commission is foregoing its claims for a civil penalty against Defendants Triten and GCZ because the entities are defunct.

The Commission has submitted proposed final judgments reflecting the remedies requested in this Motion.

Respectfully submitted this 1st day of October, 2025,

/s/ M. Graham Loomis
M. Graham Loomis
Supervisory Trial Counsel
Georgia Bar No. 457868
loomism@sec.gov

Kristin W. Murnahan
Senior Trial Counsel
Georgia Bar No. 759054
murnahank@sec.gov

Attorneys for Plaintiff
Securities and Exchange Commission
950 East Paces Ferry Road, NE,
Suite 900
Atlanta, GA 30326
Tel:(404) 842-7600
Fax:(404) 842-7679

CERTIFICATE OF SERVICE

On October 1, 2025, I electronically filed the foregoing Motion for Remedies and Default Judgment with the Office of the Clerk, using the CM/ECF system. I also certify that I sent the foregoing filing via UPS to the following:

Robert Rhatigan
Practus, LLP
11300 Tomahawk Creek Pkwy
Suite 310
Leawood, KS 66211
(Counsel for Defendants)

Garrett L.W. Adam
9 Greystone Ct.
Angleton, TX 77515

Robert S. Adam
719 S. Walker St.
Angleton, TX 77515

Virginia I. Hinojosa
715 S. Walker St.
Angleton, TX 77515

Ava A. Adam
518 Bryan St.
Angleton, TX 77515

Carrie L. Adam
719 S. Walker St.
Angleton, TX 77515

Emilio F. Hinojosa
715 S. Walker St.
Angleton, TX 77515

Dated: October 1, 2025

/s/ M. Graham Loomis
M. Graham Loomis